



July 25, 2025

**VIA ECF**

Honorable Brian R. Martinotti, U.S.D.J.  
United States District Court  
District of New Jersey  
U.S. Post Office & Courthouse  
2 Federal Square  
Newark, NJ 07102

**Re: *In re: Insulin Pricing Litigation*, MDL No. 3080  
Case No. 2:23-md-03080-BRM-LDW**

Dear Judge Martinotti:

Pursuant to CMO #5, the parties provide the following status update for the weeks ending July 18 and July 25. We have also attached a current list of pending motions.

1. On July 15, 2025, Plaintiffs submitted to Judge Wettre a letter regarding their discovery dispute with Emisar. Emisar submitted its response letter on July 22, 2025.
2. On July 16, 2025, the parties submitted discovery dispute letters to Judge Wettre. ECF Nos. 657, 658, 660, 661, 662.
3. On July 16, 2025, Defendants filed their omnibus brief regarding certain State Attorney General (AG) Track Plaintiffs' Departments, Agencies, or Offices (DAO) submissions. ECF No. 659. The State AG Track Plaintiffs are preparing their opposition, which is due July 30, 2025. Defendants' reply is due August 13, 2025. State AG Plaintiffs have requested, and Defendants have agreed, to an extension of these dates. Plaintiffs have submitted an updated proposed schedule to the Court, with their opposition due on August 6, 2025, and Defendants' reply due on August 27, 2025.
4. On July 21, 2025, the parties submitted supplemental briefs on constructive notice. ECF Nos. 666, 667.
5. On July 21, 2025, Plaintiffs circulated proposed edits to the deposition protocol; Defendants have requested a meet-and-confer.
6. The parties continue to meet and confer regarding various discovery issues.

Thank you for your continuing attention to this matter.

Respectfully submitted,

/s/ Joanne Cicala

Joanne Cicala  
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State Attorney General Track*

/s/ David R. Buchanan

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*Liaison Counsel for  
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*Liaison Counsel for  
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/s/ John D. Tortorella

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Enclosures

cc: Honorable Leda D. Wettre, U.S.M.J. (via ECF)  
Counsel of Record (via ECF)